

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:	:	Chapter 11
	:	
MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,	:	Case No.: 09-50026 (REG)
f/k/a General Motors Corp., <i>et. al.</i>	:	
	:	(Jointly Administered)
Debtors.	:	
	:	
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MOTION TO EXTEND DEADLINE

No Comes Roger Dean Gillispie (“**Mr. Gillispie**,”) by and through his counsel, and respectfully submits this Motion To Extend Deadline for the filing of Mr. Gillespie’s omnibus reply to all briefs filed in response to the *Motion For Leave To Pursue Claims Against General Motors LLC, And, Alternatively, To File A Post-Bar-Date Proof Of Claim In The Motors Liquidation Company Bankruptcy*, filed by Mr. Gillispie on June 17, 2014 [Dkt. 12727] (“**Motion**”):

1. After the parties had originally agreed on a Scheduling order providing for both New GM and the GUC Trust to file one brief each in response to the Motion, New GM sought, and was granted, leave to file a Reply to the GUC Trust brief, and the GUC Trust was granted leave to file a “Sur-Reply” to GM’s brief.

2. The briefing schedule for the Motion was previously amended to reflect the additional briefing, and was set by the Scheduling Order of September 12, 2014 [Dkt. 12893] as follows:

Event	Agreed Date
New GM and the GUC Trust to file responses (“ <u>Responses</u> ”) to the Motion	August 19, 2014
New GM to file a Reply (“ <u>New GM Reply</u> ”) to the GUC Trust Response	September 12, 2014
The GUC Trust to file a sur-reply (“ <u>GUC Trust Sur-reply</u> ”) to the New GM Reply	September 29, 2014
Mr. Gillispie to file a reply to the Responses, New GM Reply and GUC Trust Sur-reply	October 29, 2014
Hearing on Motion	Scheduled by the Court after briefing has concluded

3. Mr. Gillispie's brief is currently due October 29, 2014. However, given the volume of the submissions on which Mr. Gillispie is now responding, which quadruple the length of the Motion, and in order to allow Mr. Gillispie to conclude some factual investigation into the issues presented by these filings, Mr. Gillispie seeks two (2) additional weeks to file an omnibus response, bringing the new filing date to November 12, 2014.

4. No party objects to this Motion, and the parties have agreed to a Second Amended Stipulation and Agreed Scheduling order extending Mr. Gillispie's filing date to November 12, 2014. (The Second Amended Stipulation and Agreed Scheduling Order shall be sent to the Court and filed separately).

WHEREFORE, movant Roger Dean Gillispie respectfully requests that this Court grant this Motion To Extend Deadline.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'D. B. Owens', is written over a horizontal line.

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Attorney for Roger Dean Gillispie

CERTIFICATE OF SERVICE

I, David B. Owens, an attorney, certify that I served upon all parties, via the Court's electronic filing system and electronic mail, a copy of the foregoing Motion to Extend Deadline.

A handwritten signature in black ink, appearing to read "D. B. Owens", is written over a horizontal line.